



2018 Green Tier Annual Report

C.W. Purpero, Inc.

Established 1919

Prepared by:

Phillip A. Purpero, P.E.

President, C.W. Purpero, Inc.

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Table of Contents

1. Organizational Profile_____	3
2. Sustainable Practices Policy_____	4
3. External Audit on Environmental Management System 2018__	5
4. Environmental Performance_____	12
5. Conclusion_____	14

1.0 Organizational profile

1.1 Name of the organization

C.W. Purpero Inc. (CWP)

1.2 Primary services

CWP is a domestic contractor providing services to both public and private market participants. Its primary business activities are:

- Demolition
- Environmental Remediation
- Earthwork
 - Road Work
 - Building Construction
 - Stream, Pond & Shoreline Work
 - Real Estate Development
 - Athletic Field Construction
 - Landfill Construction
- Utilities
 - Road Work
 - Building Construction
 - Real Estate Development

1.3 Facility Locations

Corporate headquarters office: 1190 W. Rawson Avenue in Oak Creek, WI 53154

Shop facility: 5770 S. 13th Street, Milwaukee, WI 53221

1.4 Geographical area of operations

CWP provides demolition services throughout the state of Wisconsin. Earthwork and Utility work are provided in the Milwaukee, Green Bay, and Madison metro areas and everywhere in between.

1.5 Nature of ownership and legal form

C.W. Purpero, Inc. was incorporated on December 23, 1949 under Chapter 180 of the Wisconsin Statutes. It is a successor to Purpero Trucking, which began in business in 1919.

2.0 Sustainable Practices Policy

CWP will contribute to its core mission as a recognized leader within the construction industry that emphasizes environmental responsibility and dedication to sustainable and exceptional environmental performance on every job and within our own administrative operations.

The company will at a minimum identify and comply with applicable Federal, State and Local Environmental regulations. Going further, the company will recognize where it could have significant potential impacts on the environment, and where practical, implement voluntary programs and controls to prevent pollution, minimize waste, and otherwise reduce the company's impact on the environment. The company will regularly measure its performance and manage both regulated and unregulated programs to ensure continual improvement year after year.

To carry out this policy, the corporation will:

- Communicate this policy and ensure all employees understand it.
- Identify and control potentially significant environmental impacts stemming from its operations and activities.
- Establish and periodically review environmental objectives and targets through the management review process.
- Conduct pollution control and prevention activities to safeguard the public from injuries or health hazards, to protect the corporation's assets and continuity of operations, and to protect the environment.
- Work constructively with external organizations such as trade associations and government agencies to develop equitable and effective laws, regulations and standards to protect the environment.

Every employee is expected to understand and apply the environmental policy within their duties, and adhere to the policies and that flow from the EMS. Under the EMS, all employees, especially managers and supervisors, are expected to be aware of the environmental aspects of their work, and advise higher management promptly of any adverse situation that comes to their attention, including any questions or concerns about the suitability, adequacy and effectiveness of the EMS.

In addition to evidencing its commitment toward sustainability and reduced impact, CWP will enjoy benefits as a Green Tier program participant. Public and private customers place a high value on working with companies that will abide by all laws and regulations meant to protect or enhance the environment. More importantly, being recognized as a leader in developing environmental performance standards that exceed minimum standards, will help us develop relationships with customers and supply-chain partners who value the importance of such dedication and who share a similar vision. CWP looks forward to developing and strengthening such relationships with a dedicated customer base and with our trade partners.

3.0 External Audit on Environmental Management System 2018

C.W. Purpero ISO 14001:2004 EMS Audit

Green Tier Requirements Cross-Referenced with ISO 14001 Requirements

“Functionally equivalent environmental management system” means an environmental management system that includes all of the following elements and any other elements that the department determines are essential elements of International Organization for Standardization standard 14001: [ss 299.83 (1)(dg)]

Green Tier Requirement		Correlating ISO 14001:2004 Requirement	Description/Objective Evidence provided by Auditee	Findings and Comments (Conformity; Major/Minor Nonconformity; Opportunity for Improvement/OFI)
1	1. Adoption of an environmental policy that includes a commitment to compliance with environmental requirements, pollution prevention, and continual improvement in environmental performance and that is available to the public.	Clause 4.2 - Policy	The Sustainable Practices Policy is included in the EMS Manual and made available to the public via the company's report to WI DNR, which is published on the DNR website. The management team is considering posting the Sustainable Practices Policy directly on the company's website as a continual improvement measure in external communication.	Conformity
2	2. An analysis of the environmental aspects and impacts of an entity's activities.	Clause 4.3.1 - Environmental Aspects	The scope of management includes environmental aspects, which are appropriate to the scale and scope of the activities, products and services, well understood and periodically analyzed for continued suitability. The list is reviewed on a triannual basis by management. A potential opportunity for improvement could be realized from a consideration of residual risk, and utilization of the tools to address business risk and priority management.	Conformity
3	3. Establishment and implementation of plans and procedures to achieve compliance with environmental requirements and to maintain that compliance.	Clause 4.3.2 - Legal and Other Requirements; Clause 4.5.2 - Evaluation of Compliance	Legal and other requirements continue to be identified through a standing list of legal and other requirements, augmented with regulatory agency notifications, industry associations, and through consulting organizations.	Conformity

4	4. Identification of all environmental requirements applicable to the entity.	Clause 4.3.2 - Legal and Other Requirements	Management is actively and proactively engaged with WI DNR. The site is invested in several voluntary initiatives including Soil Loss Panel. A compliance calendar could be used to track and manage environmental compliance requirements in the shop.	
5	5. A process for setting environmental objectives and developing appropriate action plans to meet the objectives.	Clause 4.3.3 - Objective, Targets and Programs	The process for setting environmental objectives with action plans is established with input from top management. The site has goals related to pro-active, beyond-compliance behaviors.	Conformity
6	5m. Establishment, implementation, and maintenance of resources, roles, and responsibilities for establishing, implementing, maintaining, and improving the environmental management system.	Clause 4.4.1 – Resources, Roles, Responsibility and Authority; Clause 4.4.2 – Competence, Training and Awareness; Clause 4.4.3 - Communication	Considerable emphasis is evident of environmental leadership in C.W. Purpero, driven in part by top management's active engagement and supportive implementation of the EMS. A management representative is appointed with responsibility for implementation and maintenance of the system. Considerable resources are allocated as appropriate to identification of methods to improve the environmental performance of the organization.	Conformity
7	6. Establishment of a structure for operational control and responsibility for environmental performance.	Clause 4.4.6 - Operational Control Clause 4.4.1 - Resources, Roles, Responsibility, and Authority Clause 4.5.1 - Monitoring and Measurement	Provisions are in place for operational control, including procedures for environmental monitoring as required by permits and other key activities germane to environmental performance. A review of documentation of the company's activities and services subject to the EMS yielded observed/objective evidence that relevant and applicable environmental requirements are understood.	Conformity

8	7. Establishment, implementation, and maintenance of an employee training program to develop awareness of and competence to manage environmental issues.	Clause 4.4.2 – Competence, Training and Awareness	The company sustains general environmental management system awareness training and communication and holds daily meetings with pre-task-planning that is oriented to daily environmental management responsibilities. The company is making new investment in digital communication platforms/tools to improve documentation of task-based environmental responsibilities.	Conformity with opportunity for improvement in documentation of competency.
9	8. A plan for taking actions to prevent environmental problems and for taking emergency response and corrective actions when environmental problems occur.	Clause 4.4.7 - Emergency Preparedness and Response; Clause 4.5.3 - Nonconformity, Corrective Action and Preventive Action	A review of relevant documentation and records would affirm conformity with requirements of the Green Tier for emergency preparedness and response.	Conformity
10	9. A communication plan for collaboration with employees, the public, and the department on the design of projects and activities to achieve continuous improvement in environmental performance.	Clause 4.4.3 - Communication	C.W. Purpero works with clients, contractors and vendors to achieve continual improvement in environmental performance. Indeed, the company's field operations are subjected to daily inspection and oversight by other interested parties. Communication about EMS with the public is supported by considerable local engagement with project owners/customers, general contractors and others engaged on-site and within the industry. Performance on environmental objectives are shared with WI DNR in an annual environmental performance report, for which submittal is delayed in 2018. Planning, and management to plan, for a more timely communication with WI DNR is required.	Nonconformity

11	10. Procedures for control of documents and for keeping records related to environmental performance.	Clause 4.4.5 - Control of Documents Clause 4.5.4 - Control of Records	Records are legible and maintained appropriately. Provisions for document control are observed to be in various stages, with increasing and improving recognition of which documents might be subject to document control. Documentation of the EMS is attenuated by perceived risk, e.g., with consistent compliant performance, the perceived need for documentation is low. If/when anomaly is evident, i.e., risk of non-compliant performance, or the effectiveness of management of risk to the environment and business is otherwise lacking, then the perceived need for documentation is higher.	Conformity
12	10g. Establishment, implementation, and maintenance of procedures to monitor and measure, on a regular basis, key characteristics of an entity's operations that can have a significant environmental impact.	Clause 4.4.6 – Operational Control Clause 4.5.1 – Monitoring and Measurement	Procedural scope is adequate and implemented effectively. Monitoring and measurement activities are adequate and in conformity with requirements of Green Tier. The majority of environmental data is gathered to support business operational efficiencies, which also satisfy regulatory and Green Tier reporting requirements.	Conformity

13	10r. Establishment, implementation, and maintenance of procedures for periodically evaluating compliance with applicable environmental requirements.	Clause 4.5.2 – Evaluation and Compliance	A formal (contracted or internal) evaluation of compliance at the system level is not performed since a 2015 baseline evaluation. Evaluation of compliance on a project-by-project basis is accomplished, in part, via Erosion Control Inspection Reports. Evaluation of compliance is also conducted informally by project managers during normal day-to-day operations, subject to seasonal attenuation of scope and priority considerations. Photo documentation is used to document and communicate with employees in the field, with new digital tools under development to improve management of environmentally-relevant information. An opportunity for improvement is noted with regard to clarification of the "period" for periodic evaluation of the adequacy of the list of legal and other requirements and formal evaluation of compliance to the stated requirements.	Conformity with opportunity for improvement
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14	11. Environmental management system audits.	Clause 4.5.5 - Internal Audits	<p>Internal audit is performed more as an event than as a process and could be better integrated into normal business operations to improve the utility and value of intelligence gathering for top management decisions. The site's procedure indicates that internal audit will be performed at a minimum, annually. Management may wish to consider risk-based alternatives to calendar-based or element-by-element approaches to internal audit. Management may wish to consider approaching internal audit as a strategic activity, not an event, but rather an intel-gathering process to be performed on a frequency determined by management to drive timely delivery of information for decision-making, with consideration of risk, opportunity or other factors in determination of audit objectives germane to management's need for information to drive fulfillment of strategic intent. Management may wish to consider requiring, at the discretion of top management, participation in a multi-year rotational scheme as a component of professional development for salaried and hourly employees.</p>	Conformity
15	12. A plan for continually improving environmental performance and provision for senior management review of the plan.	Clause 4.6 - Management Review	<p>Senior management has conducted quarterly management reviews that meet the requirements of ISO 14001:2004 4.6.</p>	Conformity

3.1 Follow-up actions to EMS Audit:

a. Item 8: Training & Competence

1. The following was added to our EMS under section 4.2 titled 'Awareness, Training, Competence':

Competency shall be demonstrated through documentation of 'On The Job' training using a system integrated with overall operations. It will help implement training opportunities and document them simultaneously.

b. Item 10: Communication Plan

1. The following was added to our EMS under section 4.3 titled 'Communication':

Annual reports are required by law to be provided and made public by June 30th of each year for the previous calendar year therefore the EMS coordinator shall see to it this gets done every year in a timely manner. (The EMS coordinator shall take full responsibility for all regular EMS communications and other commitments for that matter to assure timely implementation and maintenance of system (despite the 'busyness' of everyone involved)).

c. Item 13: Legal & Other Requirements

1. The following was added to our EMS under section 3.2 titled 'Legal and Other Requirements':

Annually an experienced professional shall update our 'Legal & Other Requirements Analysis' integrating and highlighting new applicable environmental regulations.

4.0 Environmental Performance 2018

4.1 Environmental Compliance

A. Number of sites CWP is responsible for environmental compliance:

- Office facility: 1
- Shop/Yard facility: 1
- Projects: 23

B. Environmental Compliance Record 2018:

- WDNR
 - Notices of violation: 0
 - Notices of citation: 0
- Municipalities
 - Notices of violation: 0
 - Notices of citation: 0
- Internal Discoveries: 0

4.2 Environmental Objectives & Targets Performance

1. Erosion Control Maintenance Inspections System:

Objective: Develop new system for performing Erosion Control Maintenance Inspections in a way that helps better ensure compliance and provides incentive for exceeding compliance via proactive actions rather than reactive corrective actions.

Target: Develop SAAS system for internal use by end of 2018 with future metric for daily/proactive maintenance vs. corrective actions in 2019.

Actual: Preliminary system done in December 2018. Said metric to be incorporated in 2019, nothing to report for 2018 as this was planned to be future work. (two year project).

2. Landfill Diversion / Improper Disposal Reduction:

Objective: To identify opportunities to properly place slightly impacted material on projects to decrease quantities that are either landfilled or improperly disposed of by others.

Target: Identify new opportunities in in order to start diverting material in 2018.

Actual: Project identified in 2018 where material that would otherwise be landfilled is being diverted and placed on site, started in November 2018.

4.3 Analysis and Discussion

A. Observations

- Consistent and complete compliance is not only the desired result of an effective EMS but it is also the ultimate metric of an effective EMS.
- Our current O&T's have considerable potential to impact environmental performance. At the same time, these multi-year projects have significant periods in the early stages without the typical data driven targets. They do however make possible future more effective and powerful metrics, which is the goal.
- One of our objectives, the Erosion Control Inspection system, took the place of our old system which was the basis of our previous objective. It was not possible to work at both objectives at the same time as they are regarding the same aspects and impacts. This is another reason there is a lack of data supported performance metrics, we could not continue the old objective.
- Not only do our current O&T's offer CWP unique systems and opportunities to enhance environmental performance but they also have the potential to enhance industry environmental performance in addition to CWP. That's the bigger goal of our current O&T's.
- Our current O&T's progression are as follows:
 - i. Develop system and opportunities.
 - ii. Develop metrics to be used for our company to measure environmental performance.
 - iii. Establish performance benchmarks for our company to be used for our targets.
 - iv. Extend the use of these same metrics and benchmarks by offering said systems and opportunities to our industry. Possibly offer a 'Global Page' in the system that shows aggregate data vs. benchmarks.

5.0 Conclusion

2018 Performance

- Despite a lack of data driven performance indicators this year, 2018 marks a new era of going after bigger, broader goals in our environmental performance.
- Sharing our systems with our industry is a game changer for us and for the Green Tier program. It was determined that this was necessary since construction is a team sport often involving dozens of companies on one project. We become interdependent members of team that rely on each other for our collective environmental performance. This has been a challenge as it relates to our company's individual performance, so it was determined that this liability be turned into an opportunity. These opportunities are what drive our search for future objectives.

2019 Objectives & Targets

1. Erosion Control Maintenance Inspections System:

Objective: Continue development of system for performing Erosion Control Maintenance Inspections in a way that helps better ensure compliance and provides incentive for exceeding compliance via proactive actions rather than reactive corrective actions.

Targets:

- i. Continue development of SAAS system for internal continued use.
- ii. Develop metric for daily/proactive maintenance vs. corrective actions in '19.

2. Landfill Diversion / Improper Disposal Reduction:

Objective: To continue with current opportunities and identify new opportunities to properly place slightly impacted material on projects to decrease quantities that are either landfilled or improperly disposed of by others.

Target: Continue current opportunities and identify new ones to maintain current rate of diversion.

3. Find Opportunities to Reduce Auto Use For Office Staff:

Objective: To continue with current opportunities and identify new opportunities to reduce automobile use by office staff.

Target: Reduce auto use in 2019 by 2,000 miles.